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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Advanced Television Systems)
and Their Impact upon the)
Broadcast Service)

MM Docket No. 87-268

FCC 97-115; 97-116

To: The Commission)

COMMENTS OF THE ILLINOIS BROADCASTERS ASSOCIATION ON THE MSTV AND ALTV PROPOSALS TO MODIFY THE COMMISSION'S DTV RULES

The Illinois Broadcasters Association ("IBA"), by its attorneys, hereby submits comments in the above-referenced proceeding. On December 2, 1997, the Commission released a Public Notice requesting comment on filings made by the Association for Maximum Service Broadcasters (MSTV) and the Association of Local Television Stations (ALTV).

The IBA appreciates the opportunity to provide its views in response to the Commission's Public Notice. The IBA is chartered to help create and maintain a regulatory and economic environment that is optimally conducive to the growth of the free, over-the-air, local, television and radio broadcast industries in the State of Illinois. As a state broadcaster association with many members affected in many different ways by the impending transition to digital, the IBA understands well the difficult task the Commission has faced in balancing the various interests while mapping out the road to digital broadcasting. For this very reason, the IBA has chosen not to address in these comments the issues facing any specific group of

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broadcasters, but to instead comment on those issues that affect the broadcast industry's ability to serve the public as a whole.

In this regard, the IBA shares the nearly universal concern of broadcasters that recent discoveries regarding adjacent channel DTV interference be addressed in the Commission's DTV allocation table. The issues raised by this newly-discovered information go to the very heart of broadcasters' ability to serve their existing audiences in the digital age. While the IBA certainly does not wish to see the initiation of DTV service delayed while adjustments are made to the DTV table of allocations, any slight delay necessary to resolve this issue will be far better than the creation of hundreds of interfering allotments that may quite literally take decades to resolve once stations are already built and operating on those channels. The IBA is therefore in agreement with MSTV that now is the time both to deal with the adjacent DTV channel interference issue and to give serious consideration to MSTV's proposed regional "fixes" for the Great Lakes Region.

Similarly, as the recent discovery of adjacent DTV channel interference demonstrates, there is much we have to learn about the technical characteristics of DTV in real-world conditions. Because the ramifications of overestimating DTV's ability to reach the public's television antennae under less than ideal conditions could be severe for both broadcasters and the viewing public, the IBA urges the Commission to make every effort now to provide broadcasters with channel and power allocations that ensure adequate levels of service to the public. Because of the "cliff effect" of DTV, getting a too-weak DTV signal does not mean a snowy picture -- it means the public receives no picture at all. Under these circumstances, the IBA believes that it is wise to build a sufficient margin of error into DTV power levels to protect against technical deficiencies in the DTV technology that have yet to be discovered.

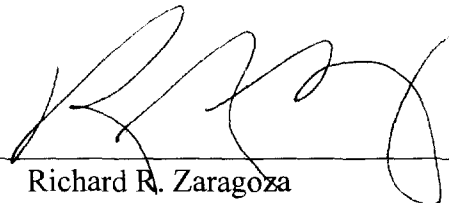
In this regard, the IBA supports the ALTV and similar proposals aimed at ensuring that broadcasters are allowed sufficient power levels to continue to fully serve their existing audiences. Such an approach is beneficial to both the public and broadcasters, and will speed the transition to digital television. It will be very hard to convince viewers to purchase digital televisions if they are unable to receive the digital programming of all of the stations that they have grown accustomed to receiving in the NTSC world. In fact, as more and more portable televisions and receivers with small antennae (such as those in personal computers equipped to display DTV) become available, the need for strong signal levels under all types of viewing conditions will be greater than it has ever been before.

Conclusion

For the reasons discussed herein, the IBA urges the Commission to move quickly to eliminate those adjacent channel DTV allotments that will create interference for the viewing public, give serious consideration to the regional "fixes" proposed by MSTV for the Great Lakes Region, and to provide adequate power levels to ensure that DTV stations' signals are readily available to their NTSC viewing audiences.

Respectfully submitted,

ILLINOIS BROADCASTERS ASSOCIATION

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